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DEPT OF TRANSPORTATION
01 JAN 17 2001**FEDERAL-INDUSTRY CONSULTING ASSOCIATES, INC.**

11345 Brandy Hall Lane #108, North Potomac, Md. 20878-2531

Phone/Fax: (301)-340-2275

NEW>>cymalloy@msn.com

TO: Charles Medalan, FMCSA (For the Record)

FROM: Cy Malloy, ACPA *cy*

DATE: 12/20/00

On behalf of my client, the American Concrete Pipe Association (ACPA), we are filing the following comments on your Dec. 18, 2000 proposed cargo securement regulations:

Correct Language-

The following is the corrected comments of ACPA, filed with Larry Minor, FMCSA, on April 21, regarding the inaccuracy in Section 3.5.5.2: It should be:

"If one tiedown is used longitudinally over the top of the pipe load, it shall be a 1/2" tiedown, with the option of two tiedowns at 3/8" strength."

The Mistaken FR Language is:

12/18/00 FR, Section V(A):

(A) Two indirect tiedowns must be placed longitudinally over the group of pipes;

[Both Sean Mc Alister and Pearson agree with our April language, which was in the draft form of the proposed regulation. This language is what was agreed on with our U. S. and Canadian concrete pipe manufacturers and associations].

Please make this correction in the final version of this regulation due in the FR in July '01.